



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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SCJ  
F. #2013R01203

271 Cadman Plaza East  
Brooklyn, New York 11201

March 11, 2016

**By FedEx**

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Re: United States v. Discala, et al.  
Criminal Docket No. 14-399 (ENV)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosures. The government again requests reciprocal discovery.

Enclosed is a disc containing materials specified below:

Defense Counsel

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| Document Description  | Bates Range   |
|---|---|
| Documents seized from Discala's home                                  | EDNY-DD-000000001 to EDNY-DD-000039627 <sup>1</sup> |
| Wiretap calls 4392, 4398, 4498, 4520, 4550, 4552                      | EDNY-ITEN-000373851                                 |
| Line-sheets (non-SMS): both pertinent and non-pertinent wiretap calls | EDNY-ITEN-000373852 to EDNY-ITEN-000377332          |

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS  
Acting United States Attorney

By: \_\_\_\_\_/s/  
Shannon C. Jones  
Patrick Hein  
Chris Nasson  
Assistant U.S. Attorneys  
(718) 254-6379 (Jones)

Enclosure

Cc: Clerk of Court (ENV) (by ECF) (w/o enclosure)

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<sup>1</sup> Discala's counsel has asserted privilege over the following documents which have been intentionally omitted from this bates-range: (box 3) 3911; 3939; 3941-3943; 3951-3995; 4089-4091; 4159-4164; 4278-4307; 4312-4314; 4421-4430; 4435-4556; 4562-4573; 4578-4658; 4689-4779; 4817-4822; 5348-5362; 5670-5682; 6589-6590; (box 4) 7008-7013; 7022-7023; 7029-7055; 7128-7131; 7143-7238; (box 5) 9173; 9182-9185; 9209-9216; (box 6) 12351-12353; 12356-12359; 12362; 12375-12379; 12386-12389; 12894-12899; 12986; 15207-15209; (box 7) 15472-15482; 15506-15510; 15608-15631; 16298-16301; 16311-16312; 16402-16410; 16775; 17400; 17412-17414; 17424-17442; 17505-17513; 17658; (box 8) 19471; 19474; 19508-19509; 19601-19608; (box 9) 21526-21527; 21729-21730; 21786-21815; (box 12) 29620-29626; 29745-29772; (box 13) 33707; (box 14) 34628; 35968-35971; (box 15) 37010-37012; 37143-37146.